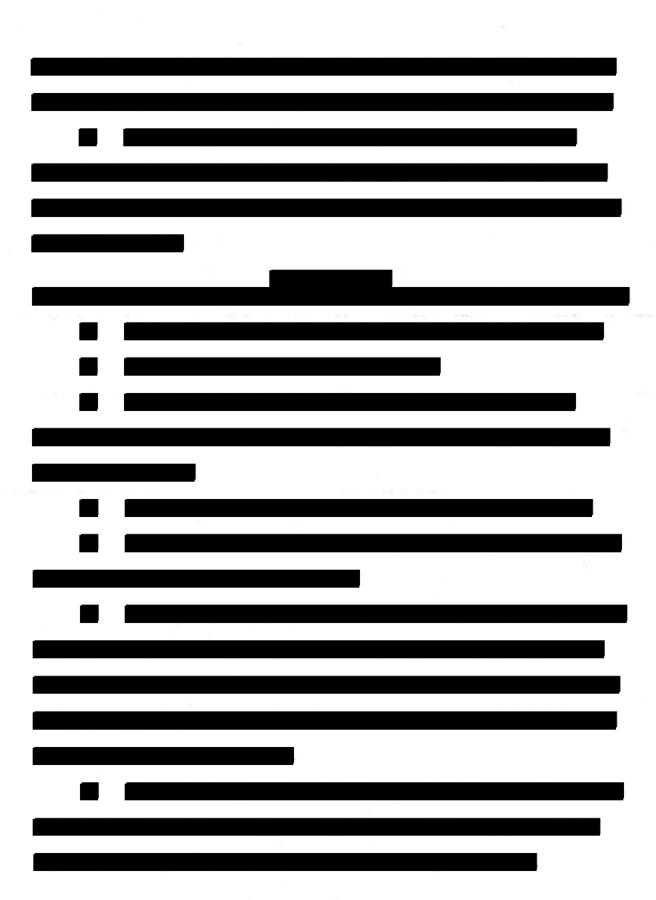
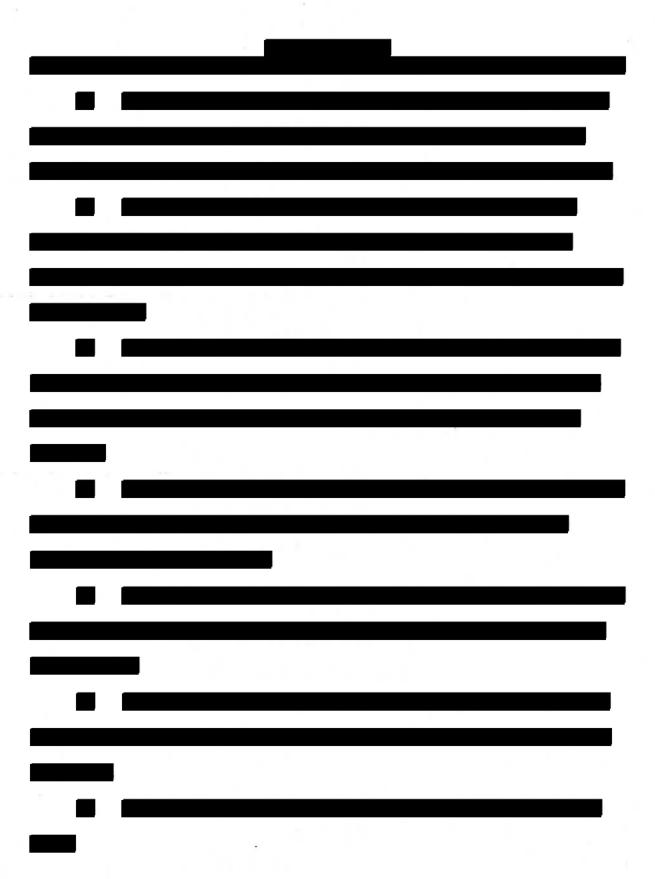
IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

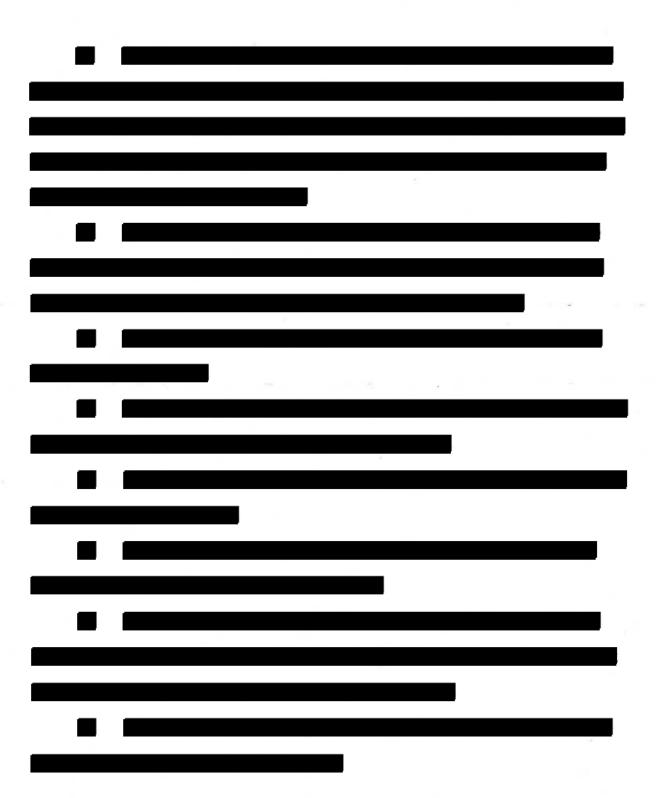
EUGENE SCALIA, SECRETAR STATES DEPARTMENT OF LA)
a	Plaintiff,) Civil No. 5:18-cv-01194
v.)
EAST PENN MANUFACTURIN	G CO.,)
	Defendant.)
DECLA	RATION OF	
Under 28 U.S.C. § 1746, I,	, declare:	
1. I have worked at Ea	st Penn Manufacturing Con	mpany ("East Penn") for the last
years starting in		
<u> </u>		
	response	-

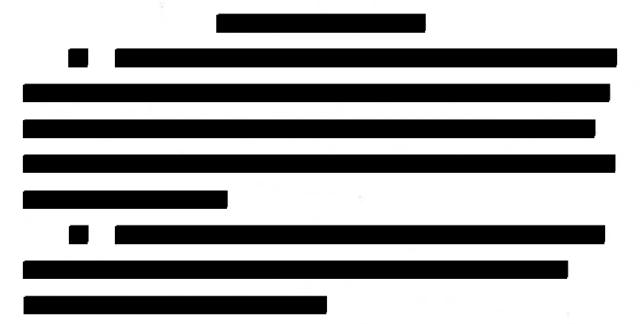
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Interview by an East Penn Attorney

- 43. Around March or April 2019, I was working on the floor when I saw Dan, who is one of the co-owners of East Penn, walking around the floor talking to people. It was probably mid- to late-morning.
- 44. I believe Dan is one of the co-owners of East Penn because he is one of the sons of the original owners.
 - 45. I saw Dan talking to one of the other maintenance guys, Fred Stein.
 - 46. After Dan finished talking to Fred Stein, Dan came over to me.
- 47. Dan asked me if I would talk to one of East Penn's lawyers about my daily routines.
 - 48. I agreed to talk to East Penn's lawyer.
- 49. After that, Dan walked away to talk to other people in the area and I went back to work.

- 50. Later that day, I think it was after lunch, Dan put out an announcement over the public announcement system for me to use a floor phone to call him at some extension.
- 51. When I called the number, Dan answered the phone and told me to come up to one of the supervisor's offices.
- 52. I walked up to the office, which I think was the plant manager's office, and the door was open, so I walked right in.
- 53. When I got into the office, Dan and a lawyer were sitting down. The lawyer introduced himself, but I do not remember his name. The lawyer did not give me his business card.
- 54. The lawyer started asking me questions about my daily routine. I do not remember all of the questions, but they were focused on when I clocked in, when I clocked out, and how long it took me to put on my uniform, shower, and get changed at the end of the day.
 - 55. While the lawyer asked me questions, I saw Dan taking notes on a computer.
- 56. I remember at one point feeling like the lawyer wanted me to change the time I said I clocked in. I think I told the lawyer that I usually clock in at 5:46 am, but the lawyer kept suggesting that I actually clocked in at 5:47 am. I remembered that interaction because I thought it was odd that East Penn cared since they never paid me for the time anyway. They didn't really focus on the time I punched out though, just the time I punched in.
- 57. I do not remember if I signed anything at the end of the interview, which took about ten (10) or fifteen (15) minutes. I know that I did not get a copy if I did sign anything.
- 58. By the end of the day, I think I remember hearing from my coworkers that about thirty people that day went to talk with the East Penn's lawyers.

I declare under penalty of perjury that the foregoing is true and correct.